

PAUL B. BRICKFIELD*†
pbrickfield@brickdonlaw.com

JOSEPH R. DONAHUE*
jdonahue@brickdonlaw.com

of counsel
NANCY J. SCAPPATICCI
ncappaticci@brickdonlaw.com

SANDRA COIRA
scoira@brickdonlaw.com

*CERTIFIED CRIMINAL TRIAL LAWYER - NEW JERSEY
† MEMBER OF NEW YORK BAR



70 GRAND AVENUE
RIVER EDGE, NEW JERSEY 07661
TELEPHONE (201) 488-7707
FACSIMILE (201) 488-9559
www.brickdonlaw.com

November 23, 2021

NEW YORK OFFICE
PAUL B. BRICKFIELD P.C.
219 WESTCHESTER AVENUE
SUITE 200
PORT CHESTER, N.Y. 10573
(914) 935-9705

Via ECF Only

Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-JPC

Dear Judge Cronan:

I represent Edward Shin in the above-referenced matter. I am writing to advise the Court that I will be seeking an adjournment of the trial date for approximately 30 days at today's pretrial conference. The basis for the request is the Government's recent and continuing discovery productions. Mr. Shin was arrested in May 2019 and indicted in July 2019. Since November 1, 2021, the Government has produced over 8,500 documents in discovery. This production is ongoing as outlined below.

1. Tuesday, November 2, 2021 at 7:52 p.m. - Approximately 3,300 pages;
2. Thursday, November 4, 2021 at 9:12 a.m. - Approximately 10 pages;
3. Saturday, November 6, 2021 at 9:00 a.m. - Approximately 60 pages;
4. Wednesday, November 10, 2021 at 7:03 p.m. - Approximately 600 pages;
5. Monday, November 15, 2021 at 9:37 p.m. - Approximately 550 pages;
6. Wednesday, November 17, 2021 at 7:34 p.m. - Approximately 460 pages;
7. Friday, November 19, 2021 at 3:27 p.m. and at 11:07 p.m.
Approximately 560 pages; and

8. Monday, November 22, 2021 at 9:07 a.m. and at 10:53 p.m. -
Approximately 3,400 pages.

I have attached copies of the Government's discovery transmittal letters hereto.

This late production is unreasonable and unfairly prejudices Mr. Shin and his counsel who simply will not have sufficient time to review, let alone, digest this volume of documents. For example, one of the Government's expected witnesses is Bum Tak Lee, a nephew of Mr. Shin, and the Government has produced in the last several days approximately 400 pages of emails, including Excel attachments, between Mr. Lee and Mr. Shin and approximately 1,800 pages of banking records relating to Mr. Lee's business First Ave Lee's Market, which the Government maintains Mr. Shin has a hidden interest. For these reasons, we will be respectfully requesting an adjournment of the trial date later today.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

encs.

cc: Robert Basil, Esq. (via ECF only w/ encs.)
Assistant U.S. Attorney Tara LaMorte (via ECF only w/ encs.)
Assistant U.S. Attorney Anden Chow (via ECF only w/ encs.)
Assistant U.S. Attorney Jessica Greenwood (via ECF only w/ encs.)



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 2, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

Tuesday

7:52 pm

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000398973 - 000402322, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000398973 - 000400063	Deposition of Samuel Ahn & Exhibits
USAO_000400064 - 000400230	Dong Lee v Shin & Noah Bank Bergen Superior Court
USAO_000400231 - 000400317	Dong Lee v Shin & Noah Bank USDC
USAO_000400318 - 000402191	Jae Ho Lee Basic Food v Shin Noah Bank
USAO_000402192	Text message
USAO_000402193 - 000402235	J [REDACTED] K [REDACTED] Notebook
USAO_000402236 - 000402322	Homeland Security Investigations Report and Inventory

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow

Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 4, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Thursday
9:12 am*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000402323 - 000402333, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO 000402323 - 000402333	Documents provided by Soo Chul Yook

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 6, 2021

Via USAfx
Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

Saturday

9:00 am

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000402334 - 000402394, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO 000402334	List of Management and Board Committee members
USAO 000402335 - 000402394	SBA Documents

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 10, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Wednesday
7:03 pm*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000402395 - 000403020, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000402395	Photograph of Edward Shin
USAO_000402396 - 000402673	Dong Lee Emails ¹
USAO_000402674 - 000403020	Sands Bethworks Gaming LLC Return

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348

¹ We believe that some portion of these emails have already been produced in discovery, however we are producing these now in an abundance of caution.



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 15, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Monday
9:37 pm*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000403021 - 000403571, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000403021	Picture of Cell Phone
USAO_000403022 - 000403115	Bum Tak Lee Emails
USAO_000403116 - 000403571	Noah Bank Documents

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 17, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Wednesday
7: 34 pm*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000403572 - 000404034, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO 000403572 - 000403991	Noah Bank Documents
USAO 000403992 - 000404028	SBA Documents
USAO 000404029 - 000404034	Translations

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 19, 2021

Via USAfx
Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Friday
3:27pm*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_00040435 - 000404596, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000404035 - 000404596	Documents from Woori Bank

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 19, 2021

Friday

11:07 pm

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000404597 - 000404604, are being made available to you on USAfx. We believe that this document was produced in discovery, however we are producing these now in an abundance of caution. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000404597 - 000404604	SBA Eligibility Questionnaire for 1797 Empire

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow

Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

November 22, 2021

Via USAfx

Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

Monday
9:07 am

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000404605 - 000406241, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO_000404605 - 000404632	Bum Tak Lee Emails
USAO_000404633 - 000406210	SOP Documents (These documents are publicly available online)
USAO_000406211 - 000406241	Documents from [REDACTED] v Chin M Yi (These documents were taken from the public docket)

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 22, 2021

Via USAfx
Paul B. Brickfield, Esq.
Brickfield & Donahue
70 Grand Avenue
River Edge, NJ 07661

*Monday
10:53 pm*

Re: *United States v. Edward Shin, 19 Cr. 552 (JPC)*

Dear Mr. Brickfield:

This letter provides additional discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure and seeks reciprocal discovery. The following materials, which have been Bates stamped USAO_000406241 - 000408073, are being made available to you on USAfx. Please note that these materials are being produced pursuant to the protective order entered in this case on August 28, 2019.

Bates Range	Description
USAO 000406241 - 000408073	Documents from Noah Bank

Nothing in this letter should be construed as a modification to the Government's requests for discovery from the defendant or any other information set forth in the Government's previous discovery letters. The Government also recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ Anden Chow
Tara M. LaMorte/Anden Chow/Jessica Greenwood
Assistant United States Attorneys
(212) 637-2348